U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

FEB 07 2022

UNITED STATES OF AMERICA)	NO. 3:22-00051 DEPUTY CLERK
V.)	18 U.S.C. § 2
GREGORY MICHAEL VOGEL a/k/a GREGORY MICHAEL SCHNEIDER)	18 U.S.C. § 1343 18 U.S.C. § 1957

MOTION TO SEAL INDICTMENT

The United States of America, by and through Mark H. Wildasin, United States Attorney, and Chris Suedekum, Assistant United States Attorney, hereby moves this Court to seal the Indictment in this case.

Defendant Gregory Michael Vogel, a/k/a Gregory Michael Schneider ("Vogel"), who is charged in the Indictment returned today, is charged with: (1) nine counts of wire fraud, in violation of Title 18, United States Code, Section 1343, and (2) money laundering, in violation of Title 18, United States Code, Section 1957.

Vogel is not currently in custody. If the Indictment is not sealed until such time as he is arrested, he may pose a flight risk. If the Indictment is not sealed, the public disclosure of the Indictment may also lead to the destruction of evidence or cause Vogel to change his patterns of behavior. Vogel is believed to be residing outside the Middle District of Tennessee, which will require federal agents to coordinate their efforts to locate and arrest him in another district. The Government also requests the Indictment be sealed to avoid creating a danger to the agents responsible for arresting Vogel.

WHEREFORE, for the above reasons, the United States respectfully requests the Indictment be sealed as described in the attached proposed Order. The Government will move to unseal the Indictment following Vogel's arrest.

Dated: February 7, 2022

Respectfully submitted,

MARK H. WILDASIN United States Attorney Middle District of Tennessee

/s/ Chris Suedekum

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